

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., *et al.*,
Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)
(Jointly Administered)**

JOINT STIPULATION AS TO FACTS

The Mortimer-side Initial Covered Sackler Persons and the State of Maryland stipulate to the following facts for the purposes of the Confirmation Hearing regarding the Seventh Amended Proposed Plan of Reorganization for Purdue Pharma L.P. and Its Affiliated Debtors and the admission of the following exhibits into the record:

1. JX-3285 is a true and correct copy of document entitled “MDS Trusts: Memorandum”, dated August 29, 2002 meeting, beginning with Bates number PPLPUCC000724070.
2. JX-3286 is a true and correct copy of a document entitled “Family Council Meeting”, beginning with Bates number PPLPUCC004048987.
3. JX-1697 is a true and correct copy of an email delivery report from Ilene Sackler Lefcourt to Richard Sackler dated July 10, 2008, beginning with Bates number PWG004448028.

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

4. JX-3282 is a true and correct copy of an email from Geraldine McNaney to Mortimer D. Sackler *et al.* dated October 8, 2008, beginning with Bates number PPLPUCC002937188.

5. JX-3287 is a true and correct copy of an email from Richard Sackler to Ake Wikstrom *et al.* dated July 3, 2009, beginning with Bates number PWG004607246.

6. JX-3288 is a true and correct copy of an email from David Sackler to Richard Sackler dated December 31, 2009, beginning with Bates number PWG004457259.

7. JX-3289 is a true and correct copy of a draft agenda for a March 1, 2011 meeting of the Purdue Board of Directors, dated February 25, 2011, beginning with Bates number PWG004462111.

8. JX-3279 is a true and correct copy of a document entitled “Proposed Calendar of Meetings – 2012”, beginning with Bates number PPLPUCC002451751.

9. JX-3290 is a true and correct copy of an email from Ilene Sackler Lefcourt to Jörg Fischer dated July 12, 2012, beginning with Bates number MDSC00022091.

10. JX-3291 is a true and correct copy of an email from Ilene Sackler Lefcourt to Stuart Baker dated July 19, 2012, beginning with Bates number MDSC00023769.

11. JX-3292 is a true and correct copy of an agenda for a March 21, 2013 meeting of the Purdue Board of Directors, beginning with Bates number PWG004337710.

12. JX-3278 is a true and correct copy of a document entitled “MDS Family Charter” dated October 1, 2013, beginning with Bates number PPLPUCC000718353.

13. JX-1718 is a true and correct copy of an email from Ilene Sackler Lefcourt to Mortimer D.A. Sackler dated October 28, 2013, beginning with Bates number PWG004673507.

14. JX-3293 is a true and correct copy of an agenda for a Beneficiaries' Meeting on November 16, 2016, beginning with Bates number PWG004338578.

15. JX-3281 is a true and correct copy of a document entitled "2014 Calendar of MDS Family Meetings", beginning with Bates number PPLPUCC9002636907.

16. JX-3294 is a true and correct copy of a report by RTI International, entitled *Filling in Gaps: A Scan for Opportunities to Respond to the Opioid Crisis*, subject to the confidentiality agreement dated February 16, 2017, beginning with Bates number PWG004762072.

17. JX-3295 is a true and correct copy of an email from Richard Sackler to Mortimer D.A. Sackler dated August 13, 2017, beginning with Bates number PPLPUCC9003938192.

18. JX-1707 is a true and correct copy of an email from Ilene Sackler Lefcourt to Josephine Martin dated September 19, 2017, beginning with Bates number PWG004485816.

19. JX-1717 is a true and correct copy of an email from Ilene Sackler Lefcourt to Samantha Sackler Hunt *et al.* dated October 18, 2017, beginning with Bates number PWG004565284.

20. JX-3296 is a true and correct copy of an email from Ilene Sackler Lefcourt to Jack Stein dated November 22, 2017, beginning with Bates number PWG004505968.

21. JX-1715 is a true and correct copy of an email from Ilene Sackler Lefcourt to Alberto Martinez dated March 17, 2018, beginning with Bates number PWG004532714.

22. JX-3297 is a true and correct copy of an undated document entitled "Supervisory Council", beginning with Bates number PPLPUCC9003938193.

23. JX-3298 is a true and correct copy of the transcript of the deposition of Ilene Sackler Lefcourt, taken on September 18, 2020.

24. JX-3299 is a true and correct copy of the Declaration of Ilene Sackler Lefcourt
Regarding Deposition Transcript and Errata Sheet, dated November 3, 2020.

Dated: August 23, 2021

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